

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. THOMAS AND ST. JOHN**

**UNITED STATES OF AMERICA,**

vs.

**JOAN MANUEL TAVAREZ BUENO,**

Defendant.

**CRIMINAL NO. 3: 24-mj-00013**

**AFFIDAVIT IN SUPPORT OF  
CRIMINAL COMPLAINT**

I, Adolph Joseph Brink IV, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent (SA) with the U.S. Department of Homeland Security (DHS), Homeland Security Investigations (HSI), currently assigned to the Office of the Resident Agent in Charge (RAC) in Saint Thomas, United States Virgin Islands and have been so employed as an SA since May of 2023. By virtue of my employment as an HSI Special Agent, I have the authority of a customs officer as described in 19 U.S.C. § 1589a and an immigration officer as described in 8 U.S.C. § 1357. Further, I am an "investigative or law enforcement officer of the United States" within the meaning defined in 18 U.S.C. § 2510(7), in that I am an agent of the United States authorized by law to conduct investigations of, and make arrests for, federal offenses. During my tenure as an HSI SA, I have completed the Criminal Investigator Training Program (CITP) and the Homeland Security Investigations Special Agent Training (HSISAT) course at the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia. At these training programs, I was trained to investigate violations of law related to controlled substances, firearms, child exploitation, financial crimes, immigration and customs law, and other violations of federal criminal law.

2. Prior to my tenure as a SA with HSI, I served as a Security Specialist with the Federal Bureau of Investigation (FBI), where I conducted limited administrative investigations regarding violations of FBI and U.S. Intelligence Community security policies and procedures. Prior to that, I served as an ELSUR Operations Technician with the FBI, where I processed all forms of electronic surveillance (ELSUR) evidence to include consensual monitoring, Title III wiretaps, and other sensitive methods of ELSUR collection in support of criminal and national security investigations. Additionally, as an ELSUR Operations Technician, I served in a collateral capacity as a photographer's assistant, which required that I attend a photography certification class offered by the FBI New York Field Office. Prior to my employment as a full-time FBI employee, I attended Florida Gulf Coast University in Fort Myers, Florida, for four years and graduated with a Bachelor of Science in Legal Studies and Criminal Justice.

3. As an HSI Special Agent, I am authorized to conduct investigations of, and to make arrests for, violations of criminal law under Title 18 of the U.S. Code, customs law under Title 19, immigration law under Title 8, and controlled substances law under Title 21.

4. The information contained within this affidavit is based on my personal knowledge, training, and experience, as well as information provided to me by other law enforcement officers assisting with this investigation. I have not included each and every fact known to me concerning this investigation; I have set forth only the facts and circumstances that I believe are sufficient to establish probable cause.

5. This affidavit is made solely for the limited purpose of setting forth probable cause to believe that Joan Manuel TAVAREZ BUENO is an alien who was previously deported and was found in the United States in violation of 8 U.S.C. § 1326.

**PROBABLE CAUSE**

4. On March 10, 2025, Homeland Security Investigations (HSI) was conducting surveillance at the Red Hook Ferry Terminal in St. Thomas, USVI due to intelligence that an alien had illegally entered the United States in St. John, USVI. Around 5:10 p.m., a National park Ranger in St. John, VI provided photographs which HSI Special Agents received that showed a female located at Annaberg Beach, St. John suspected of illegal entry into the U.S. The photographs showed a female with a light brown complexion and black hair wrapped in a bun. The female was wearing a light blue jean jacket and black shorts. She was also carrying two black bags; one was a large duffle bag with pink straps, and one was a backpack. The HSI Special Agents responded to the Red Hook ferry terminal and saw a female matching the description exit the Red Hook ferry terminal at around 6:20 p.m. She was wearing a light blue jean jacket, black shorts, and carrying a black duffle bag with pink straps and a black<sup>backpack</sup>. The female walked to a Honda CRV occupied by three other persons and entered.

5. The Honda CRV then departed the Red Hook ferry terminal HSI Special Agents followed. Near the U.S. National Park Service facility in Red Hook, St. Thomas, USVI, HSI Special Agents conducted a traffic stop of the CRV. There were four occupants in the CRV, including the defendant who was identified as Joan Tavaréz Bueno ("TAVAREZ BUENO"). All four were questioned regarding their citizenship. All were determined to be from the Dominican Republic and taken to the U.S. Immigration and Customs Enforcement (ICE) processing facility in St. Thomas, USVI for further investigation.

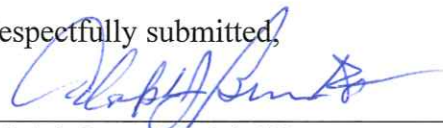
6. At the ICE facility, TAVAREZ BUENO was Mirandized, and agreed to speak with agents without an attorney present. During the interview, TAVAREZ BUENO stated that he entered the United States through St. John, USVI from Tortola, BVI on November 5, 2024, and

that he is a citizen of the Dominican Republic. TAVAREZ BUENO did not show or indicate he was given advanced, written permission to reenter the United States by the United States Attorney General or the Secretary of the Department of Homeland Security.

7. HSI Special Agents fingerprinted TAVAREZ BUENO which revealed that TAVAREZ BUENO is not a citizen of the United States. Further investigation revealed that TAVAREZ BUENO was removed from the United States on February 13, 2024, and TAVAREZ BUENO did not show or indicate he was given advanced, written permission to reenter the United States by the United States Attorney General or the Secretary of the Department of Homeland Security.

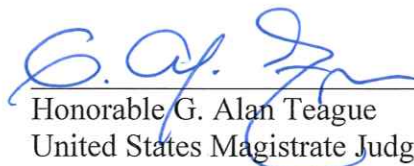
8. Based on my training and experience, I respectfully submit to the Court that probable cause exists to believe that on or about March 10, 2025, within the District of the Virgin Islands, that Joan Manuel TAVAREZ BUENO was previously deported or removed from the United States, and was found to be in the United States, all in violation of Title 8, United States Code, Section 1326.

Respectfully submitted,



Adolph Joseph Brink IV  
Special Agent  
Homeland Security Investigations

Sworn to before me and subscribed in my presence on March 11, 2025, at St. Thomas, U.S. Virgin Islands.



Honorable G. Alan Teague  
United States Magistrate Judge